

1 ROBERT W. FREEMAN  
Nevada Bar No. 3062  
2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
E. MATTHEW FREEMAN  
3 Nevada Bar No. 14198  
[Matt.Freeman@lewisbrisbois.com](mailto:Matt.Freeman@lewisbrisbois.com)  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
702.893.3383  
6 FAX: 702.893.3789  
Attorneys for Defendants  
7 Las Vegas Metropolitan Police  
Department and Sheriff Joseph Lombardo  
8 Lt. Michael Lusch

9 UNITED STATE DISTRICT COURT  
10 DISTRICT OF NEVADA, SOUTHERN DIVISION

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12 GUSTAVO RAMOS,  
13 Plaintiff,  
14 vs.

CASE NO. 2:19-cv-0124-RFB-VCF

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR THE  
FILING OF DEFENDANTS LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT, SHERIFF JOSEPH  
LOMBARDO AND LT. MICHAEL  
LUSCH'S RESPONSE TO PLAINTIFF'S  
COMPLAINT**

15 CLARK COUNTY DETENTION CENTER,  
(an operating agency of Clark County NV),  
16 NAPHCARE, INC. (a foreign corporation),  
UNKNOWN MEDICAL SERVICES  
17 PROVIDER (CORP ROE #1), WARDEN OF  
CCDC (JOHN DOE #1), in his individual and  
18 professional capacity, SHERIFF JOSEPH  
LOMBARDO, LAS VEGAS  
19 METROPOLITAN POLICE DEPARTMENT,  
in his individual and professional capacity,  
20 YOLANDA KING, in her individual and  
professional capacity, (Clark County  
21 Manager), JEFF WELLS, in his individual and  
professional capacity (Asst. Clark County  
22 Manager), LT. MICHAEL LUSCH, (Lusch or  
Lt. Lusch) in his individual and professional  
23 capacity as a supervisor at CCDC, DOES 1-X,  
ROES 1-X, et al.

24 Defendants.  
25

26 IT IS HEREBY STIPULATED AND AGREED, by and between Defendants, Las Vegas  
27 Metropolitan Police Department, Sheriff Joseph Lombardo and Lt. Michael Lusch ("Defendants"),  
28 by and through their attorney of record, Robert W. Freeman, Esq., of Lewis Brisbois Bisgaard &

1 Smith LLP, and Plaintiff Gustavo Ramos, by and through his counsel of record, Warren Ross  
2 Markowitz., of The Markowitz Law Firm, that:

3 The due date for the Defendants' Response to Plaintiff's First Amended Civil Rights  
4 Complaint (ECF No. 20), be extended Thirteen (13) days, from December 30, 2019, to January 13,  
5 2020.

6 **Reason for the Extension:**

7 Because of the complexity of the claims made in Plaintiff's Complaint, Defendants need  
8 additional time to perform an investigation prior to filing a responsive pleading. This is  
9 Defendants' first request to extend this deadline, which is made in good faith and not for purposes  
10 of delay.

11 DATED this 20<sup>th</sup> day of December, 2019.

DATED this 20<sup>th</sup> day of December, 2019.

12 THE MARKOWITZ LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH LLP

13  
14 By: /s/ Warren Ross Markowitz  
15 Warren Ross Markowitz  
16 New York Bar No. 4613220  
17 7260 W. Azure Drive  
18 Suite 140-100  
19 Las Vegas, Nevada 89130  
20 *Attorney for Plaintiff*  
21 *Gustavo Ramos*

By: /s/ Robert W. Freeman  
Robert W. Freeman, Esq.  
Nevada Bar No. 3062  
6385 S. Rainbow Blvd, Suite 600  
Las Vegas, Nevada 89118  
Attorneys for the Defendants  
Las Vegas Metropolitan Police  
Department, Sheriff Joseph Lombard and  
Lt. Michael Lusch

22 **ORDER**

23 IT IS SO ORDERED:



24 UNITED STATES MAGISTRATE JUDGE

25 12-26-2019

26 DATED: \_\_\_\_\_